

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO  
GREETING CARD ASSOCIATION INTERROGATORY (GCA/USPS-T4—25)**  
(March 9, 2012)

The United States Postal Service provides the response of Postal Service witness Neri (USPS-T-4) to the above-identified interrogatory of the Greeting Card Association dated February 24, 2012. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 9, 2012

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI  
TO GREETING CARD ASSOCIATION INTERROGATORY**

**GCA/USPS-T4-25**

(a) Can you confirm that the Postal Service's original planned deployment of DBCS 7 equipment nationwide in FY 2011 in fact has happened? If "yes", please answer parts (b) and (c) below. If you do not confirm, please explain the current status of this deployment.

(b) In light of your acknowledgement of "considerable excess mail processing capacity" on page 2, lines 16-17, of your testimony, why would the Postal Service invest in equipment in which the capacity per machine is increased 30 percent?

(c) At FY2010 mail volumes, if DBCS 6 equipment was utilized only 25 percent of the time, please confirm that DBCS 7 equipment, ceteris paribus, would have a utilization rate even lower than 25 percent. If you do not confirm, please explain why.

**RESPONSE:**

(a-c) I am aware of no Postal Service "plan" to deploy the DBCS 7. An evaluation of 1 machine occurred in North Texas, and the Postal Service decided against moving forward with deployment. As such, no speculation regarding comparisons of DBCS 6 and 7 is warranted.